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March 5, 2020

Via ECF

Hon Sarah L. Cave United States Magistrate Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>Tineo v. Berryhill</u>

17 Civ. 9273 (VSB)(SLC)

Dear Judge Cave:

I am writing to request an extension of time in which to file plaintiff's Motion for Judgment on the Pleadings. Plaintiff's papers are due to be filed on March 9, 2020. This is plaintiff's first request for an extension of time.

I am jointing Mr. David Kuznicki as co-counsel in this case and need additional time to complete my review of the file in order to properly prepare Ms. Tineo's brief in this case. The file is moderately large and it will take me some additional time to prepare her file. With the kind consent of opposing counsel, AUSA Mary Ellen Brennan, I respectfully request that the Court endorse the following revised schedule:

April 8, 2020 Plaintiff's Motion for Judgment on the pleadings

June 8, 2020 Defendant's Opposition/Cross-Motion

June 29, 2020 Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Very truly yours,

/s/ Christopher J. Bowes Christopher J. Bowes, Esq

cc: Mary Ellen Brennan, Esq. David Kuznicki, Esq.

Plaintiff's Letter-Motion for an extension of time to file her motion for judgment on the pleadings (ECF No. 12) is GRANTED. The briefing schedule for Plaintiff's motion is updated as set forth herein. The Clerk of Court is respectfully directed to close ECF No. 12.

SO-ORDERED 3/6/2020